

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_

**v.** : **DATE FILED** \_\_\_\_\_

**HASKELL PEAK** : **VIOLATIONS:**

: **21 U.S.C. § 846**

: **(conspiracy to distribute cocaine base**

: **(“crack”) and cocaine - 1 count)**

: **21 U.S.C. § 841(a)(1)**

: **(distribution of cocaine - 5 counts)**

: **21 U.S.C. § 841(a)(1)**

: **(distribution of cocaine base (“crack”) -**

: **3 counts)**

: **21 U.S.C. § 841(a)(1)**

: **(possession with the intent to distribute**

: **cocaine - 1 count)**

: **21 U.S.C. § 860**

: **(distribution in or near schools or colleges**

: **- 8 counts)**

: **Notice of Forfeiture**

**INDICTMENT** \_\_\_\_\_

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From on or about June 17, 2004 to on or about August 10, 2004, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

**HASKELL PEAK**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 50 grams or more, that is, approximately 102.6 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, and a mixture or substance containing a detectable amount of cocaine, a

Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 841(b)(1)(C).

**MANNER AND MEANS**

It was part of the conspiracy that:

2. Defendant HASKELL PEAK delivered and sold ounce quantities of cocaine base (“crack”) and cocaine to various individuals including Sandra Willadson and Betty Potter, charged elsewhere, for resale to Willadson’s and Potter’s customers.

3. Defendant HASKELL PEAK used his residence at 6853 Guyer Street, Philadelphia, to store cocaine base (“crack”) and cocaine for distribution to customers and to hide drug proceeds, paraphernalia, ammunition, and body armor.

4. After defendant HASKELL PEAK delivered cocaine base (“crack”) and cocaine to Sandra Willadson and Betty Potter, Willadson and Potter sold the cocaine base (“crack”) and cocaine to their own customers.

5. Defendant HASKELL PEAK used the vehicles to store and transport cocaine base and cocaine including, but not limited to:

a blue Mitsubishi, bearing PA license number FDM-3164 and

a white Chevrolet, bearing PA license number FPR-4775.

6. Defendant HASKELL PEAK communicated with Sandra Willadson and Betty Potter by cellular telephones and land line telephones to carry on their cocaine base and cocaine drug trafficking business.

## **OVERT ACTS**

In furtherance of the conspiracy, and to accomplish its object, the following overt acts, among others, were committed in Philadelphia, in the Eastern District of Philadelphia, and elsewhere:

### **The June 17, 2004 Sale of Cocaine**

On or about June 17, 2004:

1. Defendant HASKELL PEAK spoke by telephone with Sandra Willadson to set up a sale of cocaine to Willadson's customers, James Wood, a Philadelphia police officer acting in an undercover capacity, and a confidential source.
2. Defendant HASKELL PEAK drove in a Mitsubishi to 6430 Glenmore Avenue in Philadelphia, and gave Sandra Willadson approximately 42.2 (one and one - half ounces) grams inside the residence.
3. Sandra Willadson subsequently sold the cocaine to undercover Officer Wood and the confidential source and was paid approximately \$1,340 in cash.
4. Sandra Willadson then paid defendant HASKELL PEAK \$1,290 for the cocaine supplied by defendant PEAK.

### **The July 7, 2004 Sale of Crack Cocaine and Cocaine**

On or about July 7, 2004:

5. Defendant HASKELL PEAK spoke by telephone with Sandra Willadson to set up a sale of cocaine to Willadson's customer.
6. Defendant HASKELL PEAK drove to 6430 Glenmore Avenue in Philadelphia and handed Sandra Willadson approximately 20.7 grams of cocaine base ("crack") and approximately 27.7 grams (one ounce) of cocaine.

7. Sandra Willadson then sold the cocaine to undercover Officer Wood and the confidential source and was paid a total of approximately \$2,000 in cash.

8. Sandra Willadson then paid defendant HASKELL PEAK approximately \$1,850 in cash for the cocaine supplied by defendant PEAK.

**The July 28, 2004 Sale of Cocaine**

On or about July 28, 2004:

9. Defendant HASKELL PEAK spoke by telephone with Sandra Willadson to set up a sale of cocaine to Willadson's customer.

10. Defendant HASKELL PEAK rode on a bicycle to the area of 6430 Glenmore Avenue in Philadelphia, where he handed Sandra Willadson approximately 55.4 grams (two ounces) of cocaine.

11. Sandra Willadson then sold the cocaine to undercover Officer James Wood, who paid Willadson approximately \$1,900 in cash.

12. Sandra Willadson gave defendant HASKELL PEAK \$1850 in cash for the cocaine supplied by defendant PEAK.

**The August 4, 2004 Sale of Crack Cocaine and Cocaine**

On or about August 4, 2004:

13. Defendant HASKELL PEAK spoke by telephone with Sandra Willadson to set up the sale of cocaine base ("crack") and cocaine to Willadson's customer.

14. Defendant HASKELL PEAK drove to 6441 Glenmore Avenue in Philadelphia and gave Sandra Willadson approximately 27.8 grams (one ounce) of cocaine base ("crack") and approximately 28.2 grams (one ounce) of cocaine to Sandra Willadson.

15. Sandra Willadson then sold the cocaine base (“crack”) and the cocaine to undercover Officer Wood, who was inside 6430 Glenmore Avenue in Philadelphia, and was paid approximately \$1,900 in cash by Officer Wood.

16. Sandra Willadson then gave defendant HASKELL PEAK approximately \$1,850 in cash for cocaine base (“crack”) and cocaine supplied by defendant PEAK.

**The August 11, 2004 Sale of Cocaine Base (“crack”) and Cocaine**

On or about August 11, 2004:

17. Defendant HASKELL PEAK spoke by telephone with Sandra Willadson to set up the sale of cocaine base (“crack”) and cocaine to Willadson’s customer.

18. Defendant HASKELL PEAK drove in a Mitsubishi to the 6400 block of Glenmore Avenue in Philadelphia and gave Sandra Willadson approximately 54.1 grams (two ounces) of cocaine base (“crack”) and approximately 55.9 grams (two ounces) of cocaine.

19. Sandra Willadson sold the cocaine base (“crack”) and cocaine to undercover Officer Wood and the confidential source. Officer Wood paid Willadson approximately \$3,700 in cash.

20. Sandra Willadson paid defendant HASKELL PEAK approximately \$3,400 as payment for the cocaine base (“crack”) and cocaine supplied by defendant PEAK.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 17, 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**HASKELL PEAK**

knowingly and intentionally distributed approximately 42.2 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

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**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 17, 2004, in Philadelphia, in the Eastern District of Pennsylvania,  
and elsewhere, defendant

**HASKELL PEAK**

knowingly and intentionally distributed approximately 42.2 grams of a mixture or substance  
containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet  
of the real property comprising the John Bartram High School, a public secondary school,  
located at 2401 S. 67<sup>th</sup> Street, Philadelphia, Pennsylvania, in violation of Title 21, United States  
Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 7, 2004, in Philadelphia, in the Eastern District of Pennsylvania,  
and elsewhere, defendant

HASKELL PEAK

knowingly and intentionally distributed five grams or more, that is, approximately 27.7 grams, of  
a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled  
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).



**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 7, 2004, in Philadelphia, in the Eastern District of Pennsylvania,  
and elsewhere, defendant

**HASKELL PEAK**

knowingly and intentionally distributed approximately 27.7 grams of a mixture or substance  
containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet  
of the real property comprising the John Bartram High School, a public secondary school,  
located at 2401 S. 67<sup>th</sup> Street, Philadelphia, Pennsylvania, in violation of Title 21, United States  
Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 7, 2004, in Philadelphia, in the Eastern District of Pennsylvania,  
and elsewhere, defendant

HASKELL PEAK

knowingly and intentionally distributed more than five grams, that is, approximately 20.7 grams,  
of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II  
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (B)(1)(B).

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**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 7, 2004, in Philadelphia, in the Eastern District of Pennsylvania,  
and elsewhere, defendant

**HASKELL PEAK**

knowingly and intentionally distributed 5 grams or more, that is, approximately 20.7 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the John Bartram High School, a public secondary school, located at 2401 S. 67<sup>th</sup> Street., Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

In violation of Title 21, United States Code, Section 860(a).

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 28, 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**HASKELL PEAK**

knowingly and intentionally distributed approximately 55.4 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 28, 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**HASKELL PEAK**

knowingly and intentionally distributed approximately 55.4 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the John Bartram High School, a public secondary school, located at 2401 S. 67<sup>th</sup> Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

**COUNT TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 4, 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**HASKELL PEAK**

knowingly and intentionally distributed approximately 28.2 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 4, 2004, in Philadelphia, in the Eastern District  
of Pennsylvania, and elsewhere, defendant

**HASKELL PEAK**

knowingly and intentionally distributed approximately 28.2 grams of a mixture or substance  
containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet  
of the real property comprising the John Bartram High School, a public secondary school,  
located at 2401 S. 67<sup>th</sup> Street, Philadelphia, Pennsylvania, in violation of Title 21, United States  
Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

**COUNT TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 4, 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**HASKELL PEAK**

knowingly and intentionally distributed more than five grams, that is, approximately 27.8 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).



**COUNT THIRTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 4, 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

HASKELL PEAK

knowingly and intentionally distributed more than five grams, that is, approximately 27.8 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the John Bartram High School, a public secondary school, located at 2401 S. 67<sup>th</sup> Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

In violation of Title 21, United States Code, Section 860(a).

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**COUNT FOURTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 11, 2004, in Philadelphia, in the Eastern District  
of Pennsylvania, and elsewhere, defendant

HASKELL PEAK

knowingly and intentionally distributed approximately 55.9 grams of a mixture or substance  
containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

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**COUNT FIFTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 11, 2004, in Philadelphia, in the Eastern District  
of Pennsylvania, and elsewhere, defendant

**HASKELL PEAK**

knowingly and intentionally distributed approximately 55.9 grams of a mixture or substance  
containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet  
of the real property comprising the John Bartram High School, a public secondary school,  
located at 2401 S. 67<sup>th</sup> Street, Philadelphia, Pennsylvania, in violation of Title 21, United States  
Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

**COUNT SIXTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 11, 2004, in Philadelphia, in the Eastern District  
of Pennsylvania, and elsewhere, defendant

**HASKELL PEAK**

knowingly and intentionally distributed more than 50 grams, that is, approximately 54.1 grams,  
of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II  
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

**COUNT SEVENTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 11, 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

HASKELL PEAK

knowingly and intentionally distributed more than 50 grams, that is, approximately 54.1 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the John Bartram High School, a public secondary school, located at 2401 S. 67<sup>th</sup> Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 860(a).

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**COUNT EIGHTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 11, 2004, in Philadelphia, in the Eastern District  
of Pennsylvania, and elsewhere, defendant

HASKELL PEAK

knowingly and intentionally possessed with intent to distribute approximately 195.7 grams of a  
mixture or substance containing a detectable amount of cocaine, a Schedule II controlled  
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

## **NOTICE OF FORFEITURE**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), set forth in this indictment, defendant

HASKELL PEAK

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation of Title 21, United States Code, as charged in this indictment, and;

(b) any property constituting, or derived from, proceeds obtained directly or indirectly as the result of the violation of Title 21, United States Code, as charged in this indictment, including, but not limited to, the sum of \$10,190.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**